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May 9, 2018

BY ECF

The Honorable Ronnie
Abrams United States
District Judge Southern
District of New York 40
Foley Square
New York, New York 10007

Re: *United States v. Jason Galanis, et al.*, S1 16 Cr. 371 (RA)

Dear Judge Abrams:

We write on behalf of Bevan Cooney in the above-entitled case to respond to the Government's May 4, 2018 letter regarding trial stipulations. Although we disagree with many of the representations made by the government in their letter, we have since made significant strides towards resolution of a final stipulation. We have submitted nearly 250 exhibits to the government for inspection and stipulation. The government has noted certain objections to specific exhibits but otherwise has agreed to the majority of our exhibits. We are currently trying to resolve a handful of categorization issues and working on explaining the source of a couple of documents for the government. We should have these issues resolved in a day or two. We assure the Court that we are making this issue our first priority and we do expect to have Mr. Cooney's stipulation resolved by the end of the week.

Respectfully submitted,

/s/

Attorneys for Bevan Cooney
Paula J. Notari
Abramah Hassen